

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation

MDL No. 2327

Civil Action No. _____

PLAINTIFFS-INTERVENORS-APPLICANTS' MOTION TO INTERVENE

Mr. James C. Bell and Mrs. Kimberly K. Bell, residents of Louisiana, through their undersigned counsel, Cameron E.N. Landry, hereby move to intervene in this action. Proposed Intervenor submit that neither party will be prejudiced by this intervention based on the stage of the pending litigation. Proposed Intervenor also submit that they are a true party in interest with respect to the issues raised herein.

Pursuant to Federal Rule of Civil Procedure 24 (a)(2), the proposed Intervenor respectfully move this Court for leave to intervene in this action as of right, as Plaintiffs. In the alternative, applicants move for permissive intervention pursuant to Federal Rule of Civil Procedure 24 (b)(1)(b). As an injured male, Mr. James C. Bell, as well as his spouse, Mrs. Kimberly K. Bell, has significant interest in the subject-matter of this case, and the existing parties may not adequately represent that interest. The grounds for this Motion are set forth in the Memorandum in Support of Motion to Intervene.

WHEREOFF, Intervenor, Mr. James C. Bell and Mrs. Kimberly K. Bell, respectfully pray this Honourable Court that leave to intervene in the pending MDL 2327 action be granted.

October 9, 2013.

Respectfully submitted,

s/ Cameron N.E. Landry

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Attorney for Intervenors Mr. James C. Bell and

Mrs. Kimberly K. Bell

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5, please, serve the parties of the MDL 2327.

s/ Cameron N.E. Landry

CAMERON N. E. LANDRY (LSBA 32541)